

FILED

JAN 24 2013

JUNE A. RICHARDS, CLERK  
US DISTRICT COURT, EDC  
BY CB DDC CLK

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF NORTH CAROLINA

WESTERN DIVISION

Delisha Richardson

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(Enter above the full name  
of the Plaintiff[s] in this  
action).

Case No. 5:13-CV-53-FL

vs.

(To be assigned  
by the Clerk of  
District Court)

Brinker International

Chili's Bar & Grill, Dave Kenney,

Paul Armstrong, Mike White,

Todd Duckadoo, Tad Thomas,

Christina Schiavone,

Jason Nadar

(Enter above the full name of  
ALL Defendant[s] in this action.  
Fed.R.Civ.P.10(a) requires that  
the caption of the complaint  
include the names of all the  
parties. Merely listing one  
party and "et al." is insufficient.  
Please attach additional sheets if  
necessary).

COMPLAINT

1. Plaintiff resides at 9026 Brookfield Est  
Rocky Mount, NC 27803

2. Defendant(s) name(s): Brinker International,  
Chili's Bar & Grill, Paul Armstrong,  
& Todd Duckadoo, Dave Kenney,  
Mike White, Tad Thomas, Christina  
Schiavone,  
Jason Nadar

Location of principal office(s) of the named defendant(s):

Chili's Rocky Mount, NC

Nature of defendant(s) business: Bae & Grill

Approximate number of individuals employed by defendant:

126,000 employees world wide

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 20003-5(g).

4. The acts complained of in this suit concern:

(A) \_\_\_\_\_ Failure to employ me.

(B) \_\_\_\_\_ Termination of my employment.

(C) ☒ Failure to promote me.

(D) ☒ Other acts as specified below:

Retaliation against me after  
filing w/ EEOC w/in State of  
North Carolina.

Declining of my bonus & pay.

5. Plaintiff is:

- (A) ☒ presently employed by the defendant.  
(B) ☐ not presently employed by the defendant.

The dates of employment were \_\_\_\_\_.

Employment was terminated because:

- (1) ☐ plaintiff was discharged.  
(2) ☐ plaintiff was laid off.  
(3) ☐ plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

- (A) ☒ my race.  
(B) ☐ my religion.  
(C) ☒ my sex.  
(D) ☐ my national origin.  
(E) ☒ other as specified below:

Retaliation  
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7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

Paul Armstrong AREA DIRECTOR  
Todd Luckadoo "  
Dave Henney GENERAL MANAGER  
Tad Thomas "  
Tracie White ASSISTANT MANAGER  
Christina Schiaione "  
Jason Nadar old General Manager

8. The alleged discrimination occurred on or about Oct. 18, 2011  
To present, Retaliation began Mar. 23, 2012

9. The nature of my complaint, i.e., the manner in which the  
individuals(s) named above discriminated against me in terms of  
the conditions of my employment is as follows:

I was Repeatedly told that  
as soon as another MIT (MID)  
class opened up, I was next  
in line to go into the Manager  
training program. However after  
I found out on Oct 18, 2011 that  
2 lesser qualified whites had been  
sent to the next class & I complained  
According to company policy & procedures  
there all of a sudden was a problem  
w/ my job performance, issues arose  
w/ my schedule, & yet during the  
same time I was acting as an extra  
manager but was not getting the pay and  
10. The alleged illegal activity took place at: Chili's Rocky Mount, NC

11. I filed charges with the Equal Employment Opportunity

Commission regarding defendant(s) alleged discriminatory conduct

on or about Oct. 2011. I have attached a copy of more  
the Notice of Right to Sue letter issued by the Equal Employment determinations  
Opportunity Commission. This letter was received by me on emotional,  
Oct. 27, 2012 Physical,

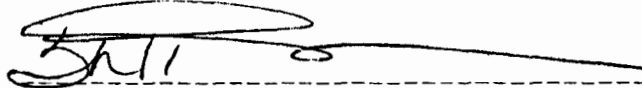
Financial well  
being w/ in the  
Company.

12. I seek the following relief:

- (A)   0   recovery of back pay;
- (B)        reinstatement to my former job;
- (C)   0   trial by jury on all issues so triable;
- and any other relief as may be appropriate, including  
injunctive orders, damages, costs and attorney's fees.

1.17.13

Date



Signature of Plaintiff

9026 Brookfield est  
Rcky Mt. N.C. 27803  
230.0954

Address and Phone Number of Plaintiff